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Attorneys for Plaintiff Le Petomane XXVII, Inc., not individually, but solely in its representative capacity as trustee of the Nevada Environmental Response Trust

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LE PETOMANE XXVII, INC., an Illinois corporation, not individually, but solely in its representative capacity as trustee of the Nevada Environmental Response Trust,

Case No.: 2:21-CV-01166-APG-NJK

Plaintiff,

V.

AMERICAN PACIFIC CORPORATION, a
Nevada corporation,

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR PLAINTIFF
TO RESPOND TO DEFENDANT'S
MOTION TO DISMISS (FIRST REQUEST)**

Defendant.

This is the **First Request** to extend the time for Plaintiff, Le Petomane XXVII, Inc. solely in its representative capacity as trustee of the Nevada Environmental Response Trust (“Plaintiff”), to extend the time to respond to American Pacific Corporation’s (“Defendant”) Motion to Dismiss Plaintiff’s First and Second Causes of Action (“Motion to Dismiss”) [ECF No. 18].

1 Plaintiff, by and through its counsel, Fennemore Craig, P.C. and Foley & Lardner LLP (*Pro Hac
2 Vice*) and Defendant, by and through their counsel, Thorndal Armstrong Delk Balkenbush &
3 Eisinger and Bassi, Edlin, Huie & Blum LLP (*Pro Hac Vice pending*), hereby stipulate to allow
4 Plaintiff a two (2) week extension to respond to Defendant's Motion to Dismiss. Counsel for
5 Plaintiff requested this short extension due to unforeseen conflicts with the hearing and briefing
6 schedules in unrelated cases. This extension request is sought in good faith and is not made for
7 the purpose of delay. Defendant filed and served its Motion to Dismiss on July 29, 2021, and the
8 current due date for Plaintiff's response is August 12, 2021. Plaintiff and Defendant hereby
9 stipulate that Plaintiff may file and serve its responsive pleading on or before August 26, 2021.

10 Dated this 4th day of August, 2021.

11 THORNDAL ARMSTRONG DELK
12 BALKENBUSH & EISINGER

13
14 By: /s/ Michael C. Hetey
15 MICHAEL C. HETEY, ESQ.
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17 1100 East Bridger Avenue
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18
19 *Attorneys for Defendant,
AMERICAN PACIFIC CORPORATION,
a Nevada corporation*

20 Dated this 4th day of August, 2021.

21 FENNEMORE CRAIG, P.C.

22
23 By: /s/ Josh Reid
24 JOSH REID, ESQ.
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25 300 South 4th Street, Suite 1400
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26
27 *Attorneys for Plaintiff,
LE PETOMANE XVII, INC. solely in
its representative capacity as trustee
of the NEVADA ENVIRONMENTAL
RESPONSE TRUST*

ORDER

IT IS ORDERED that the deadline for Plaintiff to file a response to Defendant's Motion to Dismiss [ECF No. 18] is extended from August 12, 2021 to August 26, 2021.

UNITED STATES DISTRICT JUDGE
DATED: 8/4/2021